

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

07 CV 428

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PARIS ACCESSORIES, INC.,

Civil Action No.

Plaintiff,

COMPLAINT **JUDGE BRIEANT**

-against-

LHS INTERNATIONAL CORPORATION,

Defendant.
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Plaintiff, Paris Accessories, Inc., through its attorneys, complains of defendant, LHS International Corporation, as follows:

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U.S. DISTRICT COURT
S.D. OF N.Y.
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JURISDICTION AND PARTIES

1. This action arises under the Copyright Laws of the United States, 17 U.S.C. 101, et seq. and, particularly, under 17 U.S.C. 106, 501, and is to redress the infringements of copyrights. This Court has jurisdiction over the subject matter of this claim pursuant to 28 U.S.C. 1338.
2. Venue properly lies in this Judicial District pursuant to 28 U.S.C. §1400(a) and 28 U.S.C. §1391(b). Process properly issues from this Court pursuant to Rule 4 of the Federal Rules of Civil Procedure.
3. Plaintiff is a New York corporation with a place of business at 350 Fifth Avenue, New York 10118.
4. Defendant, upon information and belief, is a New York corporation with offices and a place of business at 19511 Pauling, Foothill Ranch, California 92610.

material bearing a copy of such copyrighted design, computer programs, and print rollers, screens matrices, and the like utilized in the manufacture of the infringing designs pursuant to 17 U.S.C. § 503.

(c) That defendant be required to pay plaintiff such damages as plaintiff has sustained as a consequence of its infringement of plaintiff copyrighted design, and to account for all gains, profits, and advantages derived by it from its infringement, including profits on all sales of fabrics, bandannas and goods embodying any copy of the copyrighted designs, pursuant to 17 U.S.C. § 504.

(d) That defendant be required to pay to plaintiff the costs of this action pursuant to 17 U.S.C. § 505.

(e) That plaintiff have such other and further relief as the Court may deem just and appropriate.

Dated: New York, New York
January 16, 2007

Respectfully submitted,
SILVERBERG STONEHILL
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Attorneys for Plaintiff

By: 

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